

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division

PARVIZ N. NAFFIS

Plaintiff,

vs.

U.S. DEPARTMENT OF EDUCATION

Defendant,

CIVIL ACTION NO.
1:18-cv-02238-GJH

ORDER

Upon consideration of Plaintiff's Motion for Expedited Preliminary Injunction, it appearing that good cause having been stated, it is hereby this ____ day of _____, 2018, ORDERED, that the Motion is GRANTED, it is further ORDERED, that Defendant shall produce, within ten (10) days from the date of this Order, all documents relating to Plaintiff, specifically:

- a) All educational records pertaining to Plaintiff;
- b) Copies of any signed Master Servicing Agreements with any third parties, hired by you, to service a student loan relating to Plaintiff;
- c) Copies of all documents respecting Plaintiff relating to refinancing or consolidation of student loans;
- d) Copies of all recordings from you and/or your servicer, respecting its interactions with Plaintiff from January 1, 2014 through the present date;

e) Copies of a payment history from the inception of the loans until the present date;

f) Copies of your PCA Procedures Manual for 2014, 2015 and 2016;

g) Copies of all correspondence mailed to Plaintiff on your behalf or by a servicer from January 1, 2015 through the present date;

IT IS FURTHER ORDERED, that the Defendant within ten(10) days of the date of this ORDER, shall produce the following documents:

a) Copies of any signed Master Servicing Agreements with ACS Education Services, Xerox Education Solutions, ACS Education Solutions LLC and Xerox Education Services, LLC, respectfully, in effect on December 9, 2014 through December 31, 2016.

b) Copies of your PCA Procedures Manual for 2014, 2015 and 2016;

c) Copies of all complaints received regarding ACS Education Services, Xerox Education Solutions, ACS Education Solutions LLC and Xerox Education Services, LLC, respectfully, in effect on December 9, 2014 through December 31, 2016.

d) Provide copies of Loan Servicer's Guidelines regarding handling of student loans by ACS Education Services, Xerox Education Solutions, ACS Education Solutions LLC and Xerox Education Services, LLC,

respectfully, in effect on December 9, 2014 through December 31, 2016.

- e) Provide USDE data retention requirements for Loan Servicers, regarding collection records, telephone call recordings and correspondences.

IT IS FURTHER ORDERED, that Plaintiff shall file his attorney fees and cost petition no later than __day of_____, 2018.

Signed this__day of _____, 2018

Honorable George Jarrod Hazel
United States District Court

cc: Plaintiff's Counsel
Defendant Pro-Se